

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION ----- ETHICON WAVE 2 CASES LISTED IN EXHIBIT A TO DEFENDANTS' MOTION	Master File No. 2:12-MD-02327 MDL 2327  JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
--	---

**NOTICE OF ADOPTION OF REPLY IN SUPPORT OF PRIOR DAUBERT MOTION TO  
EXCLUDE GENERAL-CAUSATION TESTIMONY OF  
NEERAJ KOHLI, M.D., M.B.A. FOR WAVE 2**

Defendants hereby adopt and incorporate by reference the Wave 1 Reply in Support of Motion to Exclude General-Causation Testimony of Neeraj Kohli, M.D., M.B.A., Dkt. 2218. Defendants respectfully request that the Court exclude Dr. Kohli's testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the Wave 2 cases identified in Exhibit A attached to Defendants' Motion.

Respectfully submitted,

ETHICON, INC. AND  
JOHNSON & JOHNSON

/s/ Rita A. Maimbourg

Rita A. Maimbourg  
TUCKER ELLIS LLP  
950 Main Avenue, Suite 1100  
Cleveland, OH 44113-7213  
Telephone: 216.592.5000  
[rita.maimbourg@tuckerellis.com](mailto:rita.maimbourg@tuckerellis.com)

/s/ David B. Thomas

---

David B. Thomas (W.Va. Bar #3731)  
THOMAS COMBS & SPANN PLLC  
300 Summers St.  
Suite 1380 (25301)  
P.O. Box 3824  
Charleston, WV 25338  
Telephone: 304.414.1807  
[dthomas@tcspllc.com](mailto:dthomas@tcspllc.com)

/s/ Christy D. Jones

---

Christy D. Jones  
BUTLER SNOW LLP  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
Telephone: 601.985.4523  
[christy.jones@butlersnow.com](mailto:christy.jones@butlersnow.com)

**CERTIFICATE OF SERVICE**

I certify that on August 17, 2016, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ Rita A. Maimbourg

Rita A. Maimbourg

TUCKER ELLIS LLP

950 Main Avenue, Suite 1100

Cleveland, OH 44113-7213

Telephone: 216.592.5000

[rita.maimbourg@tuckerellis.com](mailto:rita.maimbourg@tuckerellis.com)